



**DLA Piper LLP (US)**  
500 Eighth Street, NW  
Washington, DC 20004  
www.dlapiper.com

Nancy Victory  
nancy.victory@dlapiper.com  
T 202.799.4216  
F 202.799.5616

October 3, 2017

**VIA IBFS**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Room TW-A325  
Washington, DC 20554

**Re: Puerto Rico Telephone Company, Inc., Petition for Declaratory Ruling under Section 310(b)(4) of the Communications Act of 1934, as Amended; File No. ISP-PDR-20170823-00002**

Dear Ms. Dortch:

América Móvil, S.A.B. de C.V. (“América Móvil”) and Puerto Rico Telephone Company, Inc. (“PRTC”), by their counsel, hereby submit additional information regarding PRTC’s above-captioned Petition for Declaratory Ruling (“Petition”).

In the Petition, PRTC requested additional flexibility for América Móvil and the Slim Family to enter into potential business transactions that could increase the Slim Family’s equity ownership and voting interests in América Móvil up to and including 100 percent. In response to a question from the International Bureau concerning the instant Petition, América Móvil wishes to confirm that it does not currently have any plans to become private, such that it would cease being subject to the transparency and disclosure obligations of a public company. Further, América Móvil stipulates as a condition for the grant of its Petition that, should it ever intend to take steps that would cause it to cease being subject to such obligations at a future date, it will seek prior Commission approval by filing another Petition for Declaratory Ruling.

Please do not hesitate to contact the undersigned counsel for América Móvil and PRTC should you have any questions or require additional information.

Respectfully submitted,

**DLA Piper LLP (US)**

*/s/ Nancy J. Victory*

Nancy J. Victory  
Partner

cc: David Krech  
Susan O’Connell